## **REMARKS**

# 1. Claim Rejections – 35 U.S.C. § 102

Claim 1-20 were rejected under 35 U.S.C. § 102(e) as being anticipated by Goldenberg et al. (U.S. Patent No. 6,636,197). Applicant respectfully traverses these rejections.

The present Application describes calculating a relationship between input associated with an input device and a tactile sensation to be applied to the user in accordance with a variable disposition of display elements to be displayed on a display device when display screen data associated with that disposition of display elements is sent to the display device. For any display screen used, a tactile control pattern can be calculated and applied.

On the other hand, the prior art included devices that applied pre-determined tactile sensations. Application, Paras. 0004-5. Likewise, the portions of Goldberg et al. cited disclose applying fixed sensation patterns associated with linear menus. Col. 15, line 62 – col. 16, line 41.

# A. Claims 1-7

Independent claim 1 as amended recites a system that "display device for displaying display screen elements, a positioning of each of the display screen elements on a display being variable with respect to the other display screen elements." The cited portions of Goldberg et al. do not disclose variable positioning of display elements with respect to one another.

Independent claim 1 as amended also recites "wherein the processing device dynamically generates a tactile sensation control pattern that defines a force pattern associated with all of the display screen elements as a function of an arrangement of the

display elements to be displayed on the display screen at the time that the display screen data is sent to the display device and stores the dynamically generated tactile sensation control pattern so that subsequently the tactile sensation applied to the user via the input device while the display elements are being displayed on the display screen is calculated by the processing device in accordance with the dynamically generated tactile sensation control pattern." The cited portions of Goldberg et al. do not disclose calculating a tactile sensation control pattern associated with all of the elements displayed in real-time when the display screen data is sent to the display device.

Claims 2-7 depend upon independent claim 1 and should be allowable for at least the same reasons. Additionally, claim 2 as amended recites that "the processing unit dynamically connects individual tactile sensation patterns in accordance with the arrangement of the display elements to be displayed on the display screen at the time that the display screen data is sent to the display device." The cited portions of Goldberg et al. do not disclose connecting individual tactile sensation patterns in real-time when the display screen data is sent to the display device.

Claim 3 as amended recites "the display elements that each have an individual tactile sensation pattern comprise (1) display objects for accepting an operation selected by the user and (2) a space between the display objects, the space being a portion on the display screen where the display objects are not present." The cited portions of Goldberg et al. do not disclose individual tactile sensation patterns associated with spaces.

### B. Claims 8-12

Independent claim 8 as amended recites "generating display screen data comprising data for display elements to be displayed within a layout on a display device, the layout of the display elements being variable." Claim 8 as amended also recites

"dynamically generating a tactile sensation control pattern when the display screen data is sent to the display device, the tactile sensation control pattern (1) defining a pattern of tactile sensation associated with all of the individual display elements to be displayed within a single screen layout, and (2) being dynamically generated by calculating a relationship between input data to be received from the input device and the tactile sensation in accordance with an arrangement of all of the display elements to be displayed within the single screen layout on a display screen of the display device."

For at least the same reasons stated above with respect to claim 1, Applicant respectfully submits that the rejection to claim 8 has been overcome. Claims 9-12 depend upon claim 8 and should be allowable for at least the same reasons.

Additionally, claim 9 as amended recites "the tactile sensation control pattern is calculated by connecting separate tactile sensation patterns associated with individual display elements in accordance with the arrangement of the display elements to be displayed on the display screen at the time that the display screen data is sent to the display device, the separate tactile sensation patterns (1) indicating the relationship between the input data and the tactile sensation for individual display elements and (2) are previously determined according to the types of the display element." The cited portions of Goldberg et al. do not disclose connecting separate tactile sensation patterns to create an overall control pattern.

Claim 10 as amended recites "the display elements having separate tactile sensation patterns comprise (1) display objects for accepting an operation selected by the user and (2) a space between the display objects, the space being a portion in the display screen where the display objects are not present." The cited portions of Goldberg do not disclose tactile patterns associated with spaces.

### C. Claims 13-18

Independent claim 13 as amended recites "generate display screen data comprising data for display elements to be displayed, an arrangement of the display elements being variable." Claim 13 as amended also recites "dynamically calculate a relationship between input data to be received from the input device and the tactile sensation in accordance with the variable arrangement of the display elements to be displayed on a display screen at the time that the display screen data is sent to the display device, and store the dynamically calculated relationship as a tactile sensation control pattern, so that the tactile sensation subsequently applied to the user when the display elements on the display screen is based upon the input data received from the input device in accordance with the tactile sensation control pattern."

For the reasons stated above with respect to claim 1, Applicant respectfully submits that the rejection to claim 13 has been overcome. Claims 14-18 depend upon claim 13 and should be allowable for at least the same reasons.

### D. Claims 19-20

Independent claim 19 as amended recites "generate display screen data comprising data for display elements, an arrangement of the display elements being variable." Claim 19 as amended also recites "dynamically calculate a relationship between input data to be received from the input device and the tactile sensation in accordance with the variable arrangement of all of the display elements to be displayed on a display screen at the time that the display screen data is sent to the display device."

For the reasons stated above with respect to claim 1, Applicant respectfully submits that the rejection to claim 19 has been overcome. Claim 20 depends upon claim 19 and should be allowable for at least the same reasons.

## **SUMMARY**

Applicant respectfully submits that all of the pending claims are in condition for allowance and seeks allowance thereof. If for any reason the Examiner is unable to allow the Application but believes that an interview would be helpful to resolve any issues, the Examiner is respectfully requested to call the undersigned at (312) 321-4277.

Respectfully submitted,

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